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UNITED STATES DISTRICT COURT

JUN -6 AM 8:40

for the

Western District of Tennessee

Memphis Division

Lucy Kimberly Ford

Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

-v-

Memphis-Shelby County Schools
A.K.A. Shelby County Board of Education

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Lucy Kimberly Ford
Street Address	4704 Wemberly Drive
City and County	Memphis and Shelby
State and Zip Code	TN 38125
Telephone Number	(901) 210-9049
E-mail Address	lforddst01@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Memphis-Shelby County Schools/Shelby County Board of ED
Job or Title <i>(if known)</i>	
Street Address	160 S. Hollywood Street
City and County	Memphis and Shelby
State and Zip Code	Tennessee, 38112
Telephone Number	(901) 416-5300
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name	Memphis-Shelby County School/Shelby County Board of ED
Street Address	160 S. Hollywood Street
City and County	Memphis and Shelby
State and Zip Code	Tennessee, 38112
Telephone Number	(901) 416-5300

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to *(check all that apply)*:



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)



Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Other federal law *(specify the federal law)*:



Relevant state law *(specify, if known)*:

(TN Code Sec. 4-21-101et seq.)



Relevant city or county law *(specify, if known)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☐ Failure to hire me.
- ☐ Termination of my employment.
- ☐ Failure to promote me.
- ☐ Failure to accommodate my disability.
- ☐ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☒ Other acts *(specify)*: **Sex Discrimination (Sexual Harassment)**

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)
8/21/2019; 10/07/2019; 04/08/2021; 04/12/2021; 05/05/2021; 10/18/2021; May 6, 2022

C. I believe that defendant(s) *(check one)*:

- ☒ is/are still committing these acts against me.
- ☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

- ☐ race
- ☐ color
- ☒ gender/sex **Sexual Harassment**
- ☐ religion
- ☐ national origin
- ☐ age *(year of birth)* *(only when asserting a claim of age discrimination.)*
- ☐ disability or perceived disability *(specify disability)*

E. The facts of my case are as follows. Attach additional pages if needed.

Defendant engaged in unlawful employment practices, in that, it violated Title VII of Civil Rights Act of 1964, when it discriminated against Plaintiff for making Sexual Harassment charges, testifying, assisting, and participating in enforcement proceedings, and with specific intent, misled Plaintiff and the Memphis -Shelby County Education Association (M-SCEA) that Plaintiff's Sexual Harassment complaint had been investigated, thereby failing to enforce Local, State and Federal policies, guidelines and laws necessary to prevent and address sexual harassment behavior in the workplace, as it was Defendant's lawful responsibility to do so.

Defendant engaged in unlawful employment practices in that it violated Title VII of the Civil Rights Act

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

07/28/2021

- B. The Equal Employment Opportunity Commission *(check one)*:

☐

has not issued a Notice of Right to Sue letter.

☒

issued a Notice of Right to Sue letter, which I received on *(date)* 03/28/2022

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

☐

60 days or more have elapsed.

☐

less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

1. Copy of complaint be served upon the Defendant, and that they be required to answer the complaint.
2. Upon hearing of the complaint, the Court issue and injunction and/or restraining order in enjoining and restraining the Defendant from continuing the discriminatory actions of the Defendants as alleged herein and above.
3. Plaintiff be granted damages, both compensatory and punitive which the Court finds the Plaintiff entitled.
4. Plaintiff be granted any and all relief prescribed for by the relevant federal statute(s).
5. And, that the Court grant such other relief as may be appropriate, including injunctive orders and damages costs.

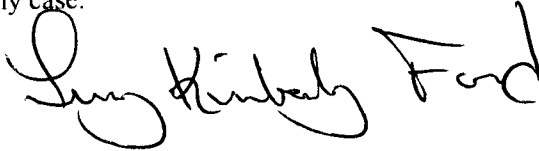
VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:



Signature of Plaintiff

Printed Name of Plaintiff Lucy Kimberly Ford

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Continuation of Lucy Ford, Plaintiff vs Memphis-Shelby County Schools, A.K.A. Shelby County Board of Education

- A. Defendant engaged in unlawful employment practices, in that, it violated Title VII of Civil Rights of 1964, when it discriminated against Plaintiff for making Sexual Harassment charges, testifying, assisting, and participating in enforcement proceedings, and with specific intent, misled Plaintiff and the Memphis Shelby County Education Association (M-SECA) that Plaintiff's Sexual Harassment complaint had been investigated, thereby failing to enforce Local, State and Federal policies, guidelines and laws necessary to prevent and address sexual harassment behavior in the workplace, as it was the Defendant's lawful responsibility to do so.
- B. Defendant engaged in unlawful employment practices in that it violated Title VII, of the Civil Rights Act of 1964, by discriminating against Plaintiff for making Sexual Harassment complaint charges, testifying, assisting, or participating in enforcement proceedings; when Defendant failed to exercise reasonable care to prevent and promptly correct the unlawful conduct of its Agents and Supervisory employee's discriminatory and retaliatory behavior of creating a hostile work environment, where Plaintiff's workplace was permeated with discriminating intimidation and insult, sufficiently severe and pervasive, financial losses and emotional trauma from being forced to work with the co-worker who committed the original Sexual Harassment violation against Plaintiff, who committed additional offensive acts of aggression towards Plaintiff; as it was Defendant's lawful responsibility to do so.

Continuation of Lucy Ford, Plaintiff vs Memphis-Shelby County Schools, A.K.A. Shelby County Board of Education

C. Defendant engaged in unlawful employment practices in that it violated Title VII, of the Civil Rights Act of 1964, for Sex Discrimination against Plaintiff because of her Sexual Harassment complaint charges, testifying, assisting, or participating in enforcement proceedings; was denied admission to employment in programs established to provide apprenticeship or other training, when Defendant failed to exercise reasonable care to prevent and promptly correct the unlawful conduct of its Agents and Supervisory employee's discriminatory and retaliatory behavior, against Plaintiff, by down grading Plaintiff's performance reports for no evidential reason (changed after formal complaint), and denying Plaintiff of Professional Development and Training opportunities and Programs, and loss of over \$5,000.00 of compensation from Plaintiff being denied Summer Teacher Employment term; as it was Defendant's lawful responsibility to do so.

Continuation of Lucy Ford, Plaintiff vs Memphis-Shelby County Schools, A.K.A. Shelby County Board of Education

D. Defendant engaged in unlawful employment practices, in that, it violated Title VII, of the Civil Rights Act of 1964; by discriminating against Plaintiff for making Sexual Harassment charges, testifying, assisting, or participating in enforcement proceedings; when Defendant failed to exercise reasonable care to prevent and promptly correct the unlawful conduct of its Agents and Supervisory employee's discriminatory and retaliatory behavior who conspired to deprive Plaintiff of protections afforded by the U.S. Equal Employment Opportunity Commission, OSHA Safety Protocols for Workplace, and Failure to follow guidelines for COVID-19 Contact Tracing and quarantined, required under the SCS and CDC Public School Re-Entry protocol(s), as it was Defendant's lawful responsibility to do so.